

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

RON WASHINGTON,)	
)	
Plaintiff,)	Case No. 3:19-cv-00154
)	
v.)	
)	
EQUIFAX,)	
)	
Defendant.)	

**DEFENDANT EQUIFAX INFORMATION SERVICES LLC’S
ANSWER AND DEFENSES TO PLAINTIFF’S COMPLAINT**

Defendant Equifax Information Services LLC (“EIS”), incorrectly identified as “Equifax” in the Civil Summons (“Complaint”), files its Answer and Defenses to Plaintiff’s Complaint as follows. (For the Court’s convenience, Plaintiff’s allegations are set forth verbatim with EIS’s responses immediately following.)

ANSWER

1. Violation of the Fair Credit Reporting Act 611 (a)(7) and Violation of the 609 Fair Credit Reporting Act.

ANSWER: EIS admits that Plaintiff purports to bring a claim under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (“FCRA”). EIS denies that it violated the FCRA, denies that Plaintiff was damaged by any action or inaction of EIS, and denies that Plaintiff is entitled to any of the relief requested.

2. Suing for \$25,000.

ANSWER: EIS denies Plaintiff is entitled to that amount or any relief claimed in his Complaint.

DEFENSES

Without assuming the burden of proof where it otherwise rests with Plaintiff, EIS pleads the following defenses to the Complaint:

FIRST DEFENSE

Plaintiff has failed to state a claim against EIS upon which relief may be granted.

SECOND DEFENSE

At all pertinent times, EIS maintained reasonable procedures to assure maximum possible accuracy in its credit reports.

THIRD DEFENSE

Plaintiff's damages, if any, were not caused by EIS, but by another person or entity for whom or for which EIS is not responsible.

FOURTH DEFENSE

EIS has complied with the FCRA in its handling of Plaintiff's credit file and is entitled to each and every defense stated in the Act and any and all limitations of liability.

EIS reserves the right to assert additional defenses that it learns through the course of discovery.

WHEREFORE, having fully answered or otherwise responded to the allegations in Plaintiff's Complaint, EIS prays that:

- (1) Plaintiff's Complaint be dismissed in its entirety and with prejudice, with all costs taxed against Plaintiff;
- (2) it be dismissed as a party to this action;
- (3) it recover such other and additional relief as the Court deems just and appropriate.

Respectfully submitted this 26th day of June 2019.

EQUIFAX INFORMATION SERVICES LLC

/s/Katy C. Laster

Katy C. Laster (#026260)

Evans Petree PC

1715 Aaron Brenner Drive, Suite 800

Memphis, TN 38120

Tel: 901-525-6781

Fax: 901-374-7548

Email: klaster@evanspetree.com

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of June 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and served it via U.S. Mail to:

Ron Washington
1492 Mutual Dr.
Clarksville, TN 37042

By: /s/Katy C. Laster
Katy C. Laster